

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

John K. Goodrow,

:

Plaintiff,

:

v.

:

Civil Action No: 3:11-cv-00020-MHL  
(Consolidated)

Friedman & MacFadyen, P.A. and  
Johnie R. Muncy,

:

:

Defendants.

---

---

**JOINT MOTION TO EXTEND STAY**

The parties now jointly move for an extension of the stay previously entered in these consolidated matters [Docket Entry 30] for the following reasons:

1. On February 13, 2012 counsel for plaintiffs provided initial data concerning numerous claims to counsel for the plaintiffs with the intention that the data be the basis for a global settlement in this matter.
2. The parties, by counsel, have agreed that counsel for defendants will reply to this production with a position statement regarding these claims on March 30, 2012.
3. The parties, by counsel, have engaged the Honorable Dennis Dohnal (retired) with the McCammon Group to mediate this matter and on March 1, 2012 held an initial planning telephone conference with him.
4. A follow up pre-mediation call is scheduled for April 23, 2012.
5. Mediation in this matter is scheduled for May 2-3, 2012.

6. The parties hope that these matters might be satisfactorily resolved on or about the date of the scheduled mediation and, if that is the case, anticipate requiring an additional short period of time to finalize any agreement and implement any relevant settlement terms.

For the foregoing reasons, the parties jointly request an extension of the entered stay in these matters until June 15, 2012.

DATED: March 21, 2012

**Respectfully Submitted,**

**FRIEDMAN & MACFADYEN, P.A.  
JOHNIE MUNCY**

**By Counsel**

/s/

Douglas P. Rucker, Jr. (VSB # 12776)  
Andrew Biondi (VSB # 48100)  
Cullen D. Seltzer (VSB #35923)  
SANDS ANDERSON PC  
2300 Bank of America Center  
1111 East Main Street (23219)  
P. O. Box 1998  
Richmond, VA 23218-1998  
(804) 648-1636  
(804) 783-7291 (facsimile)  
Email: [drucker@sandsanderson.com](mailto:drucker@sandsanderson.com)  
Email: [abiondi@sandsanderson.com](mailto:abiondi@sandsanderson.com)  
Email: [cseltzer@sandsanderson.com](mailto:cseltzer@sandsanderson.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of March, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Dale W. Pittman, Esq.  
The Law Office of Dale W. Pittman, P.C.  
112-A W. Tabb Street  
Petersburg, Virginia 23803  
Telephone: 804-861-6000  
Facsimile: 804-861-3368  
[dale@pittmanlawoffice.com](mailto:dale@pittmanlawoffice.com)  
*Counsel for Plaintiff*

John C. Petersen, Esq.  
Surovell Isaacs Petersen & Levy PLC  
4010 University Drive  
Suite 200  
Fairfax, Virginia 22030  
Telephone: 703-251-5400  
Facsimile: 703-591-9285  
[jpetersen@smillaw.com](mailto:jpetersen@smillaw.com)  
*Counsel for Plaintiff*

Kristi Cahoon Kelly, Esq.  
Surovell Isaacs Peterson & Levy PLC  
4010 University Drive  
Suite 200  
Fairfax, Virginia 22030  
Telephone: 703-277-9774  
Facsimile: 703-591-2149  
[kkelly@smillaw.com](mailto:kkelly@smillaw.com)  
*Counsel for Plaintiff*

Leonard Anthony Bennett, Esq.  
Consumer Litigation Associates, P.C.  
12515 Warwick Boulevard  
Suite 100  
Newport News, Virginia 23606  
Telephone: 757-930-3660  
Facsimile: 757-930-3662  
[lenbennett@cox.net](mailto:lenbennett@cox.net)  
*Counsel for Plaintiff*

Matthew J. Erausquin, Esq.  
Consumer Litigation Associates, P.C.  
1800 Diagonal Road  
Suite 600  
Alexandria, Virginia 22314  
Telephone: 703-273-6080  
Facsimile: 888-892-3512  
[matt@clalegal.com](mailto:matt@clalegal.com)  
*Counsel for Plaintiff*

Richard J. Rubin, Esq.  
1300 Canyon Road  
Santa Fe, New Mexico 87501  
Telephone: 505-983-4418  
Facsimile: 505-983-2050  
[dickrubin@cs.com](mailto:dickrubin@cs.com)  
*Counsel for Plaintiff*

/s/

Douglas P. Rucker, Jr. (VSB # 12776)  
Andrew Biondi (VSB # 48100)  
Cullen D. Seltzer (VSB # 35923)  
SANDS ANDERSON PC  
2300 Bank of America Center  
1111 East Main Street (23219)  
P. O. Box 1998  
Richmond, VA 23218-1998  
(804) 648-1636  
(804) 783-7291 (facsimile)  
Email: [drucker@sandsanderson.com](mailto:drucker@sandsanderson.com)  
Email: [abiondi@sandsanderson.com](mailto:abiondi@sandsanderson.com)  
Email: [cseltzer@sandsanderson.com](mailto:cseltzer@sandsanderson.com)  
*Counsel for Defendants*